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Attorneys for Defendants Calvin Rogers and  
Stevens Transport, Inc.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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<b>BRUCE ASSANTE,</b>	:
	:
<b>Plaintiff,</b>	:
	:
<b>v.</b>	:
	:
<b>CALVIN ROGERS and STEVENS</b>	:
<b>TRANSPORT and JOHN DOES 1-10</b>	:
<b>(representing presently unidentified</b>	:
<b>individuals, businesses, and/or corporations</b>	:
<b>who owned, operated, maintained, operated,</b>	:
<b>maintained, supervised, designed,</b>	:
<b>constructed, repaired, and/or controlled the</b>	:
<b>vehicle in question or otherwise employed the</b>	:
<b>defendant),</b>	:
	:
<b>Defendants.</b>	:

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**NOTICE OF REMOVAL**

Defendants Calvin Rogers, whose post-office address is 1100 Helen Drive, Newark, Delaware 19702, and Stevens Transport, Inc., the post-office address of which is Post Office Box 279010, Dallas, Texas 75227, remove this action, which has been brought by plaintiff Bruce Assante, whose post-office address is 419 Mine Road, Asbury, New Jersey 08802, from the Superior Court of the State of New Jersey, Hunterdon County to the United States District Court for the District of New Jersey.

1. The plaintiff commenced this action against Calvin Rogers, Stevens Transport, Inc., and John Does 1–10 in the Superior Court of the State of New Jersey, Hunterdon County. A copy of the complaint is attached as **Exhibit A**; a copy of the answer is attached as **Exhibit B**.

2. The plaintiff is a citizen of the State of New Jersey and was a citizen of the State of New Jersey when this action was started in state court.

a. Bruce Assante is (and was) a citizen of the State of New Jersey.

3. The defendants are citizens of states other than the State of New Jersey and were citizens of states other than the State of New Jersey when this action was started in state court.

a. Calvin Rogers is (and was) a citizen of the State of Delaware.

b. Stevens Transport, Inc. is (and was) a corporation incorporated in the State of Texas with its principal place in the State of Texas.

c. John Does 1–10 are fictitious names the citizenships of which are disregarded. *See* 28 U.S.C. § 1441(b)(1).

4. The plaintiff seeks damages in excess of \$75,000 exclusive of interest and costs, which damages were first explicitly demanded in a paper served on April 17, 2017 and received on April 18, 2017.

5. The court has subject-matter jurisdiction over this action under section 1332(a)(1) of the Judicial Code, 28 U.S.C. § 1332(a)(1), because this action—is between citizens of different states and the amount in controversy exceeds the sum or value of \$75,000 exclusive of interest and costs.

6. The defendants may, under section 1441(a) of the Judicial Code, 28 U.S.C. § 1441(a), remove this action to this court because this is a civil action of which the district courts of the United States have original jurisdiction that is brought in state court.

7. All defendants join in the removal of this action to this court.

Dated: April 19, 2017

s/ Charles D. Cole, Jr.

Charles D. Cole, Jr.

Newman Myers Kreines Gross Harris

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Stevens Transport, Inc.

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